

# EXHIBIT 1

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**From:** [nick palumbo](#)  
**To:** [David Frankel](#)  
**Cc:** [traceback@legalcallsonly.org](#)  
**Subject:** Re: Traceback Follow-up: SSA Scam  
**Date:** Monday, June 3, 2019 11:00:00 PM

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I sent the email address in the trace back you want to email him for the client info

On Mon, Jun 3, 2019 at 7:57 PM -0700, "David Frankel" <[dfrankel@zipdx.com](mailto:dfrankel@zipdx.com)> wrote:

Excellent – thank you!

We'll see what we capture for that campaign in the morning. It would be helpful for us to get the identity of his client so that we can try to head off a recurrence in the future via other providers.

Ideally all providers (starting with those in USA) would include provisions in their terms of service that require their upstream partners to cooperate with these tracebacks and to share identifying information when infractions are discovered (and to require the same of THEIR upstream partners and customers).

As I mentioned on the phone, we also want providers to be more vigilant in screening who gets access to high-volume calling and wide-open caller-ID spoofing.

Then we will see far fewer of these campaigns kicking off and will be able to quickly address them (as we have here) if they do.

David Frankel  
**ZipDX® LLC**  
Monte Sereno, CA USA  
Tel: 1-800-FRANKEL (1-800-372-6535)  
[Visit My Robocall Blog](#)

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**From:** nick palumbo <[nick@tollfreedeals.com](mailto:nick@tollfreedeals.com)>  
**Sent:** Monday, June 3, 2019 7:44 PM  
**To:** David Frankel <[dfrankel@zipdx.com](mailto:dfrankel@zipdx.com)>  
**Cc:** [traceback@legalcallsonly.org](#)  
**Subject:** Re: Traceback Follow-up: SSA Scam

I spoke to him he's pulling those call logs and going to pull that client from his routing.

On Mon, Jun 3, 2019 at 4:51 PM -0700, "David Frankel" <[dfrankel@zipdx.com](mailto:dfrankel@zipdx.com)> wrote:

Understood Nick. He should get a (very brief) window to mitigate the traffic without impacting

his other (presumably legitimate) calls.

But we do need to get everybody to step up and make sure that the illegal calling isn't permitted to begin with. Vetting new clients before allowing them to make large volumes of calls and to use any NANP caller-ID value they choose is paramount.

In these sorts of campaigns, a single complaint is representative of thousands of illegal calls (or more); it's not just the single calling number associated with the complaint. Where there's smoke, there's usually fire.

[REDACTED] needs to have a plan in place to insure that their future traffic doesn't engender more complaints (about this particular scam, or some new one).

Thanks again for the help; standing by to hear more.

David Frankel  
USTelecom Traceback Team

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**From:** Nick Palumbo <[nick@tollfreedeals.com](mailto:nick@tollfreedeals.com)>  
**Sent:** Monday, June 3, 2019 4:29 PM  
**To:** 'David Frankel' <[dfrankel@zipdx.com](mailto:dfrankel@zipdx.com)>  
**Cc:** [traceback@legalcallsonly.org](mailto:traceback@legalcallsonly.org)  
**Subject:** RE: Traceback Follow-up: SSA Scam

I called them I haven't spoken to them yet.

I sent some examples for them to trace back on as well.

I just can't shut down traffic until I speak with them.

Its possible they have 100 clients and 1 of the 100 is a bad apple.

So I will know more once I speak with them.

Best Regards,

Nick Palumbo  
CEO & Owner  
480-305-4028 Direct



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**From:** David Frankel <[dfrankel@zipdx.com](mailto:dfrankel@zipdx.com)>  
**Sent:** Monday, June 3, 2019 4:26 PM  
**To:** 'Nick Palumbo' <[nick@tollfreedeals.com](mailto:nick@tollfreedeals.com)>  
**Cc:** [traceback@legalcallsonly.org](mailto:traceback@legalcallsonly.org)  
**Subject:** RE: Traceback Follow-up: SSA Scam

Hi Nick –

Thanks for your time on the phone just now.

I wanted to capture here what we discovered – looking at the additional SSA calls that we are tracing back today, to:

+14074806536  
+14043451478  
+16039918351  
+17408680192

You confirmed these all came to you from [REDACTED]

We also glanced at some similar call examples that occurred earlier today and did NOT get input to our traceback process:

+17037724459  
+19897378923  
+12154996601

The caller-ID on these was not 877, but instead was +1828865304X – your data matched ours and the calls came from [REDACTED]. These calls that we looked up are just a few examples of thousands that we have that are representative of the millions of illegal calls that are associated with this campaign.

We agreed that we can't think of a logical explanation for why somebody in India would be making millions of calls all over the USA, using many different caller-ID values all of which are (valid or invalid) USA numbers.

I explained that these calls are impersonating Social Security Agents and that the SSA Inspector General's Office has been working with us to track down these calls.

You are going to contact [REDACTED] and see what you can learn, and barring any surprise explanation, we expect these calls to stop. You're going to share what you learn with us so that we can try to prevent the calls from continuing via some other provider.

Looking forward to hearing from you.

Thanks again for your promptness on this stuff, and for looking at the call records in real time

with me.

We plan to trace back more calls tomorrow if they are continuing. I may check with you first to insure that those examples are not coming through your network.

David

David Frankel  
USTelecom Traceback Team  
+1 408 884 1445

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**From:** Nick Palumbo <[nick@tollfreedeals.com](mailto:nick@tollfreedeals.com)>  
**Sent:** Monday, June 3, 2019 4:01 PM  
**To:** 'David Frankel' <[dfrankel@zipdx.com](mailto:dfrankel@zipdx.com)>  
**Cc:** [traceback@legalcallsonly.org](mailto:traceback@legalcallsonly.org)  
**Subject:** RE: Traceback Follow-up: SSA Scam

About 5 million calls today in total.

I have been running them for a few months and this is the 1<sup>st</sup> complaint we have received.

Not sure there is as much activity as you think there is.

Best Regards,

Nick Palumbo  
CEO & Owner  
480-305-4028 Direct



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**From:** David Frankel <[dfrankel@zipdx.com](mailto:dfrankel@zipdx.com)>  
**Sent:** Monday, June 3, 2019 3:35 PM  
**To:** 'Nick Palumbo' <[nick@tollfreedeals.com](mailto:nick@tollfreedeals.com)>  
**Cc:** [traceback@legalcallsonly.org](mailto:traceback@legalcallsonly.org)  
**Subject:** RE: Traceback Follow-up: SSA Scam

Thanks for that info, Nick.

How many calls from that customer [REDACTED]? We know they are using many different caller-ID's; seemingly picking random IDs every few calls.

Our data suggests that they are making hundreds of thousands of illegal calls per hour, all impersonating government officials.

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**From:** Nick Palumbo <[nick@tollfreedeals.com](mailto:nick@tollfreedeals.com)>

**Sent:** Monday, June 3, 2019 3:31 PM

**To:** 'David Frankel' <[dfrankel@zipdx.com](mailto:dfrankel@zipdx.com)>

**Cc:** [traceback@legalcallsonly.org](mailto:traceback@legalcallsonly.org)

**Subject:** RE: Traceback Follow-up: SSA Scam

2 calls from that phone number.

Best Regards,

Nick Palumbo  
CEO & Owner  
480-305-4028 Direct



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**From:** David Frankel <[dfrankel@zipdx.com](mailto:dfrankel@zipdx.com)>

**Sent:** Monday, June 3, 2019 3:24 PM

**To:** 'nick palumbo' <[nick@tollfreedeals.com](mailto:nick@tollfreedeals.com)>

**Cc:** [traceback@legalcallsonly.org](mailto:traceback@legalcallsonly.org)

**Subject:** Traceback Follow-up: SSA Scam

Nick,

Thanks for the quick response on this latest call example.

We have dispatched a hop request to the name in India [REDACTED] that you identified; we'll see if we get a response. When somebody claims to be a service provider and is using an @gmail address, we get quite suspicious.

In the meantime: This call is part of a massive illegal calling campaign. There are some additional details that you can see in the portal in the hop display towards the bottom.

These guys are claiming to be from the Social Security Administration (illegal); they are calling massive numbers of mobile phones with an automated message (illegal); they are using improper caller-id (for your example, it was 877 116 3423 which is not a valid toll-free number).

Could you please look at your call records for today and see how many calls these guys are sending through your network? Also, what is the average call duration (I imagine it is very short). Take a look also at the caller-ID values they are using; we've seen a variety of toll-free numbers (which they seem to just pick at random) as well as some geographic numbers (also apparently not meaningful).

Please take steps to stop the calls.

Happy to discuss if you have any feedback or questions.

David

David Frankel  
USTelecom Traceback Team  
+1 408 884 1445